UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK	
In the Matter of Tehila Chaia Sara Naor and Tomer Naor, children under the age of 16	X : :
YEHUDA NAOR,	:
Petitioner,	:
v. ·	;
NANCY ELIZABETH SCHERER,	:
Respondent.	:
JED S. RAKOFF, U.S.D.J.	- X
STATE OF NEW YORK): ss.:	
COUNTY OF NEW YORK) 35	

07 CIV. 3639 (JR)

Affidavit of Hillel Deutsch

HILLEL DEUTSCH, being first duly sworn, deposes and says:

- I am a member of the Bar of this Court and of the firm of Cahill Gordon & 1. Reindel LLP, attorneys for Yehuda Naor, the Petitioner in this action.
- 2. The following are true and correct copies of the documents they purport to be as sent to me by Petitioner:
 - (a) Exhibit A.1 is a true and correct copy of the Respondent's 2005 application to AIS for a sabbatical year during the 2006-2007 school year as sent to me by Petitioner.
 - Exhibit A.2 is a true and correct copy of the Petitioner's letter to the (b) Central Authority in Israel asking for information on how to file a petition to compel the return of his children as sent to me by Petitioner.

- (c) Exhibit A.3 is a true and correct copy of the signature page of Respondent's petition to the Israeli court for the right to retain custody of the Children in the United States through, at minimum, the end of April 2008, as sent to me by Petitioner.
- 3. These documents are submitted in connection with 42 USCS § 11605, which states that for evidence submitted to the court in connection with a Hague petition case "no authentication of such application, petition, document, or information shall be required in order for the application, petition, document, or information to be admissible in court", Article 23 of the Convention, which states that no legalization or similar formality may be required in connection with a Hague petition case, and Article 30 of the Convention, granting the admissibility of documents appended to any application submitted "to the judicial or administrative authorities of a Contracting State."

Hillel Deutsch

Sworn to before me this 1st the day of May, 2007

Notary Public

DEBORAH SAVINO SCOTTO Notary Public, State of New York No. 43-4628627 Qualified in Richmond County Commission Expires June 30, 2010

EXHIBIT A.1



AMERICAN INTERNATIONAL SCHOOL

In Israel Inc.

Robert A. Sills Superintendent

Filed 05/31/2007

TEL #: 972-9-961-8100 FAX #: 972-9-961-8111 E-mail: aisrael@wbals.org Website: www.wbais.org

To:

From: Subject: Date:

Nancy Scherer Naor Sabbatical Application December 5, 2005

AREA OF INVESTIGATION:

As we move further into the 21st century, the field of education is facing numerous challenges in keeping up with change and providing students with academic programs that prepare them for the world that they will enter upon completion of their studies. AIS is one such school that has always tried to be at the forefront of educational innovation. One such endeavor that has been embarked upon has been the creation and adoption of a strategic plan that is specific to the needs of our diverse and transient population. The adoption of such an all encompassing plan is an enormous undertaking by a school that is also comprised of a transient, international staff. As I work toward the completion of a doctorate in education, I would like to analyze the research that has been done over the past few decades on strategic planning, and follow the progress of the strategic plan that is implemented at AIS. There is a large body of knowledge on this subject that cites the success and failures of schools that have undertaken such a task. There are a numerous variables to be examined that may have contributed to these diverse outcomes. Some factors that most likely impact upon success or failure of the implementation of a strategic plan may be school size, the number and types of objectives that were implemented, the duration of time allotted for the plan, and the perceptions of those who are affected both directly and indirectly by the new plan.

PROPOSAL:

During my sabbatical year, I intend to work toward the completion of the dissertation component of my doctoral thesis at New York University. NYU's philosophy and mission statement offers me the opportunity to investigate a field of research that will be of value to my current position at AIS and to the school as a whole. Not only would I be completing the writing portion of my doctorate, I would also be completing coursework that is required for this degree. I intend for the focus of my investigation to be that of strategic planning. Being that AIS

is in the process of creating and implementing a long-term strategic plan, I would like to review the abundant literature and educational research on this topic. Upon completing an extensive literature review, I would proceed in utilizing my findings to analyze and assess the progress of the strategic plan. The end result of such a study will be a comprehensive evaluation of the ongoing process of organizational change that the plan is oriented toward. This evaluation would be comprised of two major components; the analysis of internal and external data.

- · A component of my research and analysis would be to examine other schools that have engaged in the strategic planning process.
- · I would like to review the failures and successes, and the conclusive data, and bring those findings back to AIS. By reviewing those schools that already have undertaken this organizational change, I am sure that much knowledge could be applied and facilitate the implementation at AIS.
- This analysis would also encompass such factors as the economic benefits to AIS, student demographics, the need to compete with the emerging models in education while maintaining a comprehensive program, and teacher satisfaction.

RATIONALE:

During my sabbatical year, I intend to engage in the investigation of how strategic planning has evolved in education over the last few decades and how adopting such a model for AIS is extremely crucial to the success and competitiveness of a school with such a diverse and transient population. For those who are involved in the implementation of this plan, analyzing and understanding the benefits of such a plan would be beneficial and aid in directing the school toward a desired future state. These studies will contribute to my knowledge base and give me an opportunity to cultivate the tools that would enable me to participate in the successful implement the strategic plan. After such an intense study, I would also return to the school possessing knowledge that could be used as a resource to my colleagues as we proceed through this fluid process.

PROPOSED OUTCOMES FOR INDIVIDUAL ON SABBATICAL:

As I pursue my Doctorate of Education in this area of study during my sabbatical year, I intend to gain invaluable knowledge about strategic planning and apply my knowledge base to the change process that AIS will be undergoing

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over the next five years. In organizational theory, this planning framework often falls under the organizational elements model. This model has three basic results; product, outputs, and outcomes. However, this is often grouped into three domains: organizational efforts, organizational results, and societal results/impacts. My study and analysis of these areas of strategic planning in relation to the plan implemented at AIS will give me the tools to act as a change agent, and aid in facilitating the success of the school's mission. Since I will be returning to AIS after my sabbatical year, and have intentions of remaining a member of the staff through 2010, the time given to implement the plan, I feel that this work will benefit me in my professional career as a teacher, staff member, educator, as well as an individual.

PROPOSED OUTCOMES FOR STUDENTS/SCHOOL/COMMUNITY:

SUMMARY:

This upcoming sabbatical year will allot me the time and opportunity to pursue a study that I feel will enhance my professional career, as well as provide me with tools and knowledge that will be beneficial to the AIS community as it proceeds into the next decade. Since we are committed to remaining a competitive institution, facilitating the adoption and success of the school's plan is an extremely crucial role, not only for individuals, but also for an organization to undertake. Many forces that drive a school to commit to the strategic planning process will need to be examined as I stated above. These may also include: funding, demand for a "modernized" curriculum while maintaining elements of "traditional" models, the constant change in the demographic makeup, and teacher acceptance of such a plan, or rather collective vision building. I feel that the completion of my doctorate, focusing upon strategic planning, can be a factor in guiding the school to successful attainment of its goals and mission.

EXHIBIT A.2

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State Of Israel	מדינת ישראל	,
Ministry Of Justice		,
Office Of The State Attorney	משרד המשפטים	
Department Of International Affairs	פרקליטות המדינה ה <i>מתרהת חוניינים ביול</i> אויצים	
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EXHIBIT A.3

- 53. במועד נסיעתה של התובעת לארה"ב, הייתה כוונתה להשלים, כאמור את לימודי הדוקטורט שלה ולשוב ארצה עם
 - 54. במהלך שהות התובעת בארה"ב, נוכחה התובעת לגלות כי הנתבע נוקט כלפיה תכסיסים להחזירה ארצה בניגוד להסכמות שהיו ביניהם, כאשר למעשה מטרתו האמיתית הינה להתגרש ממנה. לתובעת אף חשדות מבוסטים כי לנתבע ישנה אשה חדשה בחייו.
- 55 התובעת התאכזבה ביותר לגלות את יחטו של הנתבע כלפיה וכלפי הילדים בתקופה זו, שכן קיוותה כי דווקא המרחק ביניהם, ופסק הזמן שלקחו, ירכך את הנתבע ויגרום לו לעשות הכל כדי לשכנע את התובעת כאהבתו כלפיה וברצונו הכן ומאמיתי לחיות איתה בתא משפחתי אחד.
 - 56. לאור התנהגות הנתבע-מחד, ולאור האושר והפריחה שחשו התובעת וילדיה תקטינים בעת שהותם בשנה החולפת בניו-יורק (למעט בגין האיומים וההצקות הבלתי פוסקות מצד הנתבע, שניסה למרד את חייה גם מרחוק), החלו לצוץ במוחה מחשבות על רצון להגר ביחד עם ילדיה לארה״ב.
- 57. לאור מאמור לענייל, שוקלת התובעת אפשרות להגיש בתום שחותת המוארכת, בקשת הגירה, וזאת במידה ולא תניע עד אז להסכמות עם הנתבע בדבר שאלת המשך חייהם המשותפים ומקום מגורם העתידי,, אולם מכל מקום כרגע חשוב לתובעת לקבל היתר לחאריך השהות עד לסוף חודש יוני 2008 ולכל הפחות עד סוף חודש אפריל 2008, לצורך השלמת לימודי הדוקטורט כאמור.
 - 58. מיותר לציין כי התובעת מתחייבת להחזיר את הקטינים ארצה בכל מועד שיורה לה ביהמייש הגכבד, ואין לה כל כוונת לפעול בניגוד לדין.

העתיכה . 7

- 59. תובענה זו מוגשת ע"פ הוראות חוק הכשרות המשפטית והאפוטרופוסות, המעניקות סמכות לביהמ"ש לדון ולחכריע בנושאים הקשורים לעניינו של קטין, במקרה בו ההורים עצמם לא הצליחו להגיע להסכמה ביניהם.
 - .60. לבימייש נכבד זה הסמכות לדון בתביעה עפייו מהותה.
 - 61. אשר על כן מתבקש כבי ביהמייש לייתן החלטה וצווים כדלקמן:
- ליתן החלטה הקובעת כי ממועד הגשת תביעה זו ועד לסוף חודש יוני 2008 (סוף לימודי הקטינה) או לכל הפחות עד לסוף חודש אפריל 2008 יהיו הקטינים (אשר בעניינם מוגשת הבקשה), במשמורת של אימס חתובעת.
- ליתן צו המתיר לתובעת להאריך את שהותה ואת שהות ילדיה הקטינים בחו״ל, עד לסוף חודש יוני ι, Έ 2008 , <u>ולפחות</u> עד לסוף חודש אפריל 2008 (מועד סיום לימודי הדוקטורט של התובעת), אשר במהלכם תשלים התובעת את לימודי הדוקטורט שלה אותם החלה באוניברסיטת N.Y.U, בארה"ב.
- תשומת לב ביהננייש הנכבד מופנית לכך, כי בין הצדדים הושכם כי התובעת תשהה בחו"ל עד לחודש אוגוסט 2007, ואין ברצונה להמשיך לשהות שם ללא התר חוקי,ולפיכך לוח הזמנים המתבקש מכך הינו צפוף ועמוס. אשר על כן מתבקש ביהמייש הנכבד לדון בתובענה במועד מוקדם ככל האפיצר
 - ליתן כל צו וכל סעד זמני הדרושים לשם מימוש המשך חשהות בחו"ל . 7
 - לחייב הנתבע בהוצאות משפט ושכייט עוייד כדין. . 17
 - מן הדין ומן הצדק להעתר לבקשת.

ריכוונה אלייני עו"ד בייכ התוביות

> הערה : לאחר סיום כתיבת תובענה זו, נודע לתובעת כי הנתבע נקט בארח"ב, בהליכים לפי אמנת האג, ונקבע דיון ראשון בהליכים הנ"ל בביהמייש בניו-יורק בתאריך ה-16/5/07.